

1 3993 Howard Hughes Parkway, Suite 600
 Las Vegas, NV 89169-5996
 Facsimile (702) 949-8321
 Telephone (702) 949-8320

2 Rob Charles NV State Bar No. 006593
 Email: rcharles@lrlaw.com
 John Hinderaker AZ State Bar No. 018024
 Email: jhinderaker@lrlaw.com
 Marvin Ruth NV State Bar No. 10979
 Email: mruth@lrlaw.com

3 Attorneys for USACM Liquidating Trust

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UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA

5 In re:

6 USA COMMERCIAL MORTGAGE
 COMPANY,

7 USA CAPITAL REALTY ADVISORS,
 LLC,¹

8 USA CAPITAL DIVERSIFIED TRUST
 DEED FUND, LLC,

9 USA CAPITAL FIRST TRUST DEED
 FUND, LLC,²

10 USA SECURITIES, LLC,³ Debtors.

11 Affects:

- All Debtors
- USA Commercial Mortgage Company
- USA Capital Realty Advisors, LLC
- USA Capital Diversified Trust Deed Fund, LLC
- USA Capital First Trust Deed Fund, LLC
- USA Securities, LLC

12 Case No. BK-S-06-10725-LBR¹
 Case No. BK-S-06-10726-LBR¹
 Case No. BK-S-06-10727-LBR²
 Case No. BK-S-06-10728-LBR²
 Case No. BK-S-06-10729-LBR³

13 CHAPTER 11

14 Jointly Administered Under Case No.
 BK-S-06-10725 LBR

15 **STIPULATION TO WITHDRAWAL
 OF UNIVERSAL MANAGEMENT,
 INC.'S OPPOSITION TO THE
 THIRTEENTH OMNIBUS
 OBJECTION OF USACM TRUST TO
 PROOFS OF CLAIM BASED, IN
 WHOLE OR IN PART, UPON
 INVESTMENT IN THE BAY
 POMPANO BEACH LOAN**

16 Date of Hearing: August 21, 2009

17 Time of Hearing: 9:30 a.m.

18 The USACM Liquidating Trust (the “USACM Trust”) and Universal Management,
 Inc. (“Universal”) hereby stipulate to the withdrawal of Universal’s Opposition [DK 7332]
 to the Thirteenth Omnibus Objection of USACM Trust to Proofs of Claim Based, in

21 ¹ This bankruptcy case was closed on September 23, 2008.

22 ² This bankruptcy case was closed on October 12, 2007.

23 ³ This bankruptcy case was closed on December 21, 2007.



1 Whole or in Part, Upon Investment in the Bay Pompano Beach Loan (the "Objection")
2 [DK 7291].

3 Additionally, Universal stipulates to a Court order sustaining the Objection and the
4 relief sought by the USACM Trust therein.

5 Dated: August 20, 2009.

6 LEWIS AND ROCA LLP
7

8 By /s/ Marvin Ruth (#10979)
9 Rob Charles, NV 6593
John Hinderaker, AZ 18024 (*pro hac vice*)
Marvin Ruth, NV 10979
10 3993 Howard Hughes Parkway, Suite 600
Las Vegas, Nevada 89169
Telephone: (702) 949-8200
Facsimile: (702) 949-8398
E-mail: mruth@lrlaw.com
11 *Attorneys for the USACM Liquidating Trust*

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13 UNIVERSAL MANAGEMENT, INC.
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15 By /s/ Tariq Chaudhry
16 Tariq Chaudhry
President
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